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Environmental
Resources
Management, Inc.

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16 March 1993
Reference: C6401-00-01

Mr. George B. Markert
Senior Environmental Consultant
Corporate Environmental Affairs
Bridgestone/Firestone, Inc.
1200 Firestone Parkway
Akron, Oh. 44317-0001



Re: Responses to Comments and Revisions,
draft report, Feasibility Study
Woodlawn Landfill RI/FS, Cecil County, Md.

Dear Mr. Markert:

On behalf of the Cecil County Department of Public Works, Environmental Resources Management, Inc. (ERM) is submitting written comments to the preliminary Responses to Comments and Revisions of the Feasibility draft report. This preliminary copy was transmitted by you to Mr. Barry Belford. Verbal comments were given to Kristen Johnson of IT by Joseph Lewandowski on March 11, 1993. The comments are as follows:

Comment No. 13 - modify the first set of bullets of Section 1.5.1 as follows:

- Groundwater, *except from the Transfer Station drain field.*

Comment No. 56 - According to county officials, to the best of their knowledge, waste disposal has not occurred in the Eastern Corridor area delineated on the site map. Also, the overflow from the Transfer Station Drain Field did not spread over the entire area indicated as the "Eastern Corridor" on the site map. Therefore, the sentence, "There is evidence that waste disposal occurred in this area." should be deleted. In addition, reference to this Eastern Corridor should reflect a more realistic result of any effect from the Transfer Station drain field. Soil sampling results and the baseline risk assessment did not suggest, in comparison to the landfill, a large area of contamination. The baseline risk assessment indicated that leaching from the drain field soils is not expected to result in groundwater contaminant concentrations that exceed remedial action goals, that exposure to drain field subsurface soils

is not expected to result in cancer risks, and that exposure to drain field surface soils fall within acceptable cancer risk range.

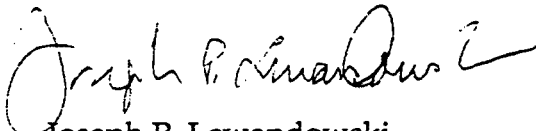
According to the results of the RI/FS and Baseline Risk Assessment the remedial action objectives for the transfer station area can be satisfied by preventing exposure of human receptors to contaminated drain field surface soils, preventing exposure of environmental receptors to soil containing more than 1 ppb mercury and by preventing runoff of contaminated surface soils.



These objectives can be met with a more practical approach as indicated in EPA's comments in the FS regarding the Transfer Station drain field.

If you have any questions, please call me at (410)-266-0006.

Sincerely,


Joseph P. Lewandowski
Project Manager

JPL/mwj
enclosures:

cc: D. Rossi, EPA
A. Jacobs, IT corporation
E. Nolen, MDE
P. Marks, Esq.
B. Belford, Cecil County
K. Gaynor, Esq.

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